

Dear Mr. Anderson:

Please accept this email message as comments from the National Roofing Contractors Association (NRCA) on Draft 1 of the ENERGY STAR Roof Products Specification, version 2.0.

NRCA's specific comments are as follows:

- 1) In 1) Definitions, some confusion exists for roof products that are installed on both low-slope roofs and steep-slope roofs (e.g., metal roof panels). It needs to be clarified which specification (Table 1 or Table 2) applies for these products to avoid confusion by users of the ENERGY STAR program. Selecting the most conservation specification (Table 1) appears to be the most logical approach in resolving this.
- 2) Regarding the newly added thermal emittance criteria, we support this added criteria at the level "...greater than or equal to 0.75..." described. Note, in Table 1, "...of..." should be changed to "...or..."
- 3) Regarding EPA's consideration of increasing the initial solar reflectance level in Table 1 from 0.65 to 0.70, we support this specific revision as it (along with the new emittance criteria) will make the ENERGY STAR Roof Productions Specification consistent with the requirements of ASHRAE 90.1 for invoking their "Exception to 5.3.1.1."
- 4) Regarding EPA's consideration of no longer allowing cleaning of samples prior to testing maintenance of solar reflectance values, NRCA is in strong support of this revision as it is more representative of actual field conditions.
- 5) Regarding EPA's consideration of allowing the use of accelerated aging in the determination of maintenance of solar reflectance values, NRCA remains strongly opposed to allowing accelerated aging for this purpose as it is known to not replicate the dirt pick-up-related discoloration experienced with aging under normal field conditions. Also, allowing accelerated aging appears to conflict with the intent to no longer allow cleaning of samples prior to testing maintenance of solar reflectance values.
- 6) Regarding the issue of existing ENERGY STAR products being based upon cleaned sample testing and new products being listed based upon weathered, uncleaned samples, we are concerned that this will result in confusion by users in the marketplace. Also, we do not considered the proposed inclusion of an asterisk or other marking to be adequate to explain the difference between cleaned and uncleaned samples to users of ENERGY STAR. For the sake of consistent interpretation, ENERGY STAR's criteria also needs to be consistent, even if it requires delisting some products (similar to as you will likely need to do with the added emittance criteria and by increasing solar reflectivity from 0.65 to 0.70).

Thank you for allowing NRCA the opportunity to provide comments on the updated draft of the ENERGY STAR Roof Products Specification. Should you have any questions or comments regarding the information contained herein, or if NRCA may be of further assistance, please do not hesitate to contact me directly.

Regards,

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